

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION (COLUMBUS)**

JACQUELYN CARPENTER,)	CASE NO. 2:21-cv-00568
)	
Plaintiff,)	JUDGE SARAH D. MORRISON
)	
v.)	Magistrate Judge Chelsey M. Vascura
)	
SOUTHERN AIRWAYS EXPRESS, <i>et</i>)	
<i>al.</i> ,)	
)	
Defendants.)	

JOINT MOTION TO STAY

Plaintiff Jacquelyn Carpenter and Defendants, Southern Airways Express (“SAE”), Rob McKinney, and Susan Neff (collectively, the “Parties”), through counsel, hereby move this Court for an Order staying all proceedings in this action until after the Court has issued a ruling on Defendants’ Motion to Dismiss for Lack of Jurisdiction and Improper Venue filed May 5, 2021 (ECF No. 9). Defendants have argued this action is improperly venued in Ohio, as SAE is purportedly headquartered in Florida, and “most senior management employees are either located in Florida or act at the direction of those employees located in Florida.” *Id.* at PageID 50. As none of the attorneys currently in this case are licensed in Florida, it is unlikely they will continue this litigation on behalf of the Parties, should the Court either dismiss this case or transfer it to Florida.

The Parties do not want to incur the time, energy, and expense of engaging in discovery, taking depositions, and otherwise litigating this case if it is going to be transferred to Florida (or dismissed for lack of jurisdiction and improper venue). Instead, the Parties wish to wait until the Court issues its ruling on Defendants’ Motion, and then they can decide how they want to proceed.

WHEREFORE, the Parties respectfully request an Order staying all proceedings in this matter until after this Court has ruled on undersigned counsel's Motion to Dismiss.

Respectfully submitted,

/s/ Pamela S. Krivda

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Attorney for Plaintiff Jacquelyn Carpenter

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Matthew G. Bruce

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